

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**AMERICAN DRIVELINE CENTERS,
INC. and
ATI TRANSMISSIONS, INC.**

Plaintiffs,

V.

GERALD H. HANSEN,

Defendant.

CIVIL ACTION NO.: 12-5280

DEFENDANT GERALD H. HANSEN'S INITIAL DISCLOSURES

Pursuant to Rule 26(a) of the Federal Rules of Civil Procedure, Defendant/Counterclaim Plaintiff Gerald H. Hansen, by and through undersigned counsel, makes the following initial disclosures. These disclosures are made without waiving the following:

1. Any and all objections as to competency, relevance, materiality, privilege and admissibility of any evidence for any purpose in any subsequent proceeding or trial of this or any other action.
2. The right to object to the use of any of these responses, or the documents identified and/or produced, in any subsequent proceeding or the trial of this or any other action on any ground.
3. The right to object on any ground at any time to a demand for further response to these or any other discovery proceedings; and,
4. The right to supplement and/or amend these responses based upon the discovery of additional documents and/or information.

I. REQUIRED DISCLOSURES

A. The name and last known address of persons reasonably likely to have information that bears significantly on the claims and defenses, with identification of the subjects of the information, are as follows:

1. Mr. Gerald H. Hansen – 3315 Pony Tracks Drive, Colorado Springs, CO 80922
2. Mr. John Conway – 201 Gibraltar Road, Horsham, PA 19044
3. Mr. Zary Luke -- 8844 Kingston Pike, Knoxville, TN 37923
4. Mr. Gary Zimmerman – 201 Gibraltar Road, Horsham, PA 19044
5. Mr. Mike Partington – (Address unknown), Fort Myers, FL
6. Mr. Daniel (last name unknown) -- 201 Gibraltar Road, Horsham, PA 19044
7. Mr. Curt Hapward – 201 Gibraltar Road, Horsham, PA 19044
8. Mr. Craig Henning – 201 Gibraltar Road, Horsham, PA 19044
9. All persons who are or may be identified in Plaintiff's Initial Disclosure Statement.

B. A general description, including location of all documents, data, compilations, and tangible things in the Defendants' possession, custody or control that are likely to bear significantly on the claims and defenses, is as follows:

Upon information and belief, documents bearing upon Plaintiffs' alleged damages are in Plaintiff's possession, custody and control. In addition, Defendant has in his possession, documents and correspondence between he and Plaintiffs and information regarding damages alleged in the Counterclaim.

C. A computation of any category of damages claimed by the disclosing party

Defendant/Counterclaim Plaintiff Hansen has suffered damages in that:

1. He paid \$210,000 as a down payment on the Purchase Price and Plaintiffs have failed to reimburse those monies to Defendant Hansen;
2. He has incurred unnecessary attorney's fees and expenses to defend himself in this action.
3. He has suffered additional damages related to obtaining the funds to make the payment described above.
4. Hansen's damages are ongoing.

D. The existence and content of any insurance agreement under which any person or entity carrying on an insurance business may be liable to satisfy all or part of the judgment that may be entered in the action, or indemnify or reimburse for payments made to satisfy the judgment, making available such agreement for inspection and copying, is as follows:

Defendant Hansen is unaware of the existence of any applicable insurance policies.

E. The identity of any person who may be used at trial to present evidence under Rules 702, 703 or 705 of the Federal Rules of Evidence:

At this time, there is no such person who will give such testimony on Hansen's behalf.

Respectfully submitted,

Date: December 13, 2012

s/ Andrew S. Kasmien

ANDREW S. KASMEN, ESQ. (PA Bar #58926)

STEPHEN G. BURNS, ESQ. (PA Bar #28183)

BURNS & KASMEN

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Attorneys for Defendant/Counterclaim Plaintiff

Gerald H. Hansen

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of December 2012, a copy of the foregoing has been electronically filed with the Clerk of the Court using the CM/ECF, which shall send notification of such filing to the following:

William B. Jameson, Esq.
Cottman Transmission Systems, LLC
201 Gibraltar Road, Suite 150
Hatboro, PA 19044
610.668.2900
Attorney for Plaintiff

s/ Andrew S. Kasmén
ANDREW S. KASMEN